

Adelaida J. Ferchmin

Admitted to practice in Louisiana

(504)581-6062 Fax (504)522-9129 aferchmin@preisplc.com

Pan American Life Center 601 Poydras Street, Suite 1700 New Orleans, LA 70130

www.preisplc.com

August 11, 2016

VIA FIRST-CLASS MAIL

Region 6 Freedom of Information Officer U.S. EPA, Region 6 (6MD-OE) 1445 Ross Avenue Dallas, TX 75202-2733

RE: Pollock Elementary School, 4001 Highway 8, Pollock, Louisiana 71467 (the "School") and the Grant Parish School Board, 410 Sibley Street, Benton, Louisiana 71006 (the "Board")

Dear Sir or Madam:

We represent Monsanto Company, Solutia Inc. and Pharmacia Corporation in connection with a claim being made regarding the alleged presence and/or former presence of polychlorinated biphenyls ("PCBs") at the School and other properties of the Board. Pursuant to the Federal Freedom of Information Act, 5 U.S.C. § 552 et seq. ("FOIA"), and the FOIA regulations promulgated by the United States Environmental Protection Agency ("EPA"), 40 CFR § 2.100 et seq., we request the opportunity to inspect and/or receive a photocopy of the following Documents¹ in the possession, custody or control of the EPA, Region 6:

 All Documents relating to any investigation, sampling, testing, assessment, evaluation, and removal of PCBs or any other hazardous or toxic substances alleged to be present or formerly present at the School and other real properties

¹ "Document" or "Documents" means, all writings of every kind, such as letters, memoranda, reports, studies, correspondence, emails, notations and records of telephone calls and conversations, notes, minutes and records of meetings, diaries, journals, calendars, notebooks, communications, contracts, agreements, bills, inspection reports, and records. The term also includes information stored electronically. Drafts of the foregoing are also included.



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owned by the Board, whether planned or actually completed (collectively, the "School Work");

- All correspondence to or from EPA, or anyone purporting to act on behalf of EPA, and any consultant, expert, engineer, or other advisor, whether or not engaged by EPA, relating to the School Work, including all Documents referenced therein;
- All correspondence to or from EPA, or anyone purporting to act on behalf of the EPA, and the Board, or Grant Parish, Louisiana's local government, including any of its subdivisions, relating to the School Work, including all Documents referenced therein;
- All correspondence to or from EPA, or anyone purporting to act on behalf of EPA and the Board, or Grant Parish, Louisiana's local government, including any of its subdivisions, or any other Louisiana municipality or Board of Education of any other Louisiana municipality, relating to or arising out of any investigation, sampling, testing, assessment, evaluation, and removal of PCBs or any other hazardous or toxic substances alleged to be present or formerly present at any school under the control, directly or indirectly, in whole or in part, of the Board or Grant Parish, Louisiana's local government, including any of its subdivisions, or any other Louisiana municipality or Board of Education of any other Louisiana municipality, whether planned or actually completed;
- All field notes, hand-written notes, School inspection reports, internal EPA
 memoranda, sampling results, reports, and evaluations relating to or arising out
 of the School Work;
- All correspondence to or from EPA, or anyone purporting to act on behalf of EPA, and any third parties or other governmental authorities relating to the School Work, including but not limited to the Louisiana Department of Education, the Louisiana Department of Health and the Louisiana Department of Environmental Quality, including all Documents referenced therein;
- All requests for information (i.e. FOIA requests) received by EPA relating to the
 presence, potential presence or former presence of PCBs in schools in Louisiana,
 including any responses thereto, from any third parties or other governmental
 authorities;
- All publicly available information or materials relating to the presence, potential presence or former presence, of PCBs in schools under the control, directly or



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indirectly, in whole or in part, of the Board or any other school in Louisiana, including all prior versions of same; and

 All photographs and videos taken of or at the School, or of any item therein, and related to the School Work, by EPA or anyone purporting to act on behalf of EPA.

Thank you in advance for your cooperation in this matter. If you should have any questions, please contact me at (504) 581-6062.

Sincerely,

Adelaida J. Ferchmin